

October 27, 2025

California Air Resources Board
1001 I Street, Sacramento, CA 95814
P.O. Box 2815, Sacramento, CA 95812
Email: climatedisclosure@arb.ca.gov

Re: Draft Reporting Template for Scope 1 and Scope 2 GHG Emissions

ConocoPhillips is an independent exploration and production company headquartered in Houston, Texas. As of Dec. 31, 2024, we had operations and activities in 15 countries. In California, we transport, market and trade power, crude oil and natural gas.

We believe providing stakeholders with information on climate-related risks is an important step toward transparency, accountability and action on advancing our company's goals and related performance. We have published a sustainability report, including climate-related information, annually since 2005 aligned with leading voluntary reporting standards, frameworks, disclosure expectations, and regulatory requirements. We use internationally recognized standards to guide our voluntary reporting, including the International Financial Reporting Standards (IFRS) Foundation Sustainability Disclosure Standard for Climate-related Disclosures.

We submit this letter to CARB in response to its request for feedback on the draft reporting template for Scope 1 and 2 GHG emissions, as required by Senate Bill 253 (SB 253) Climate Corporate Data Accountability Act.

Scope 1 and 2 Emission Intensity in Revenue

We question whether requiring reporting GHG intensity, expressed as a ratio of GHG emissions per unit of economic value, will yield meaningful or actionable data for stakeholders. Given the volatility of commodity prices, emissions intensity as measured by our GHG emissions over revenue can vary significantly year by year. For example, over the past five years our intensity by revenue has varied up to fourfold. We suggest a better measure of GHG intensity for our

industry would be to measure emissions output against production, as this limits the distortionary impacts of external and unrelated market forces, and it is the most appropriate in understanding the changing nature of our portfolio. It provides more valuable and comparable data for stakeholders.

Emissions Factors and Calculation Approaches

We report emissions in accordance with regulations in the jurisdictions in which we operate including:

- **Alberta, Canada:** Emissions Management and Climate Resilience Act: Specified Gas Reporting Regulation, Alberta Regulation 251/2004.
- **Australia:** The National Greenhouse and Energy Reporting Act 2007 (NGER Act) and the National Greenhouse and Energy Reporting (Measurement) Determination 2008.
- **British Columbia, Canada:** Greenhouse Gas Industrial Reporting and Control Act: Greenhouse Gas Emission Reporting Regulation, British Columbia Reg. 249/2015.
- **European Union:** EU Emissions Trading System, Monitoring and Reporting Regulation Council Directive 2003/87/EC, as amended by Council Directive 2009/29/EC.
- **Norway:** Greenhouse Gas Emission Trading Act of 17 December 2004.
- **United Kingdom:** UK Emissions Trading Scheme established through the Greenhouse Gas Emissions Trading Scheme of 2020.
- **United States:** 40 CFR 98 Subparts C, MM, W, and Y. Stationary Combustion Sources; Suppliers of Petroleum Products; Petroleum and Natural Gas Systems; Petroleum Refineries.

Emissions factors and calculation methodologies differ across jurisdictions. Our approaches are aligned with applicable regulatory requirements and recognized industry standards, as appropriate. All calculations are assured in accordance with jurisdictional regulations and undergo third-party limited assurance at the parent company level.

To facilitate reporting at the parent company level, we recommend the template allows flexibility to reference applicable jurisdictional requirements and/or industry standards only and not require detailed information on specific source/year of emissions factors or calculation approaches applied. Doing so in our view would be onerous for the company and would not provide additional or meaningful data for stakeholders.

Exclusion of Non-Material Sources and Emissions

Through the independent third-party assurance process, company approaches and methodologies are assessed, tested and verified to ensure disclosures are material, relevant,

complete, and in conformance with the criteria and/or relevant GHG reporting program requirements. Given the approaches and methodologies are assured, companies should not be required to report sources, emission quantities or categories that are neither material nor relevant. We do not believe this will provide meaningful or actionable data for stakeholders. Disclosures should focus only on what is material and relevant and allow the assurance process to verify those thresholds and approaches.

We appreciate the opportunity to provide these comments. We recognize the importance of climate-related disclosures and aim to ensure our disclosures are conveyed to stakeholders clearly and transparently. We look forward to reviewing draft regulations and we stand ready to respond to any questions you may have with respect to this letter or our views regarding climate-related disclosures. Please contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Dalzell". The signature is fluid and cursive, with the first name "Julie" being more prominent than the last name "Dalzell".

Julie Dalzell
Vice President, Sustainable Development